

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	Chapter 11
)	
JOANN INC., et al. ¹)	Case No. 25-10068 (CTG)
)	
Debtors.)	(Jointly Administered)
)	
)	Re: Docket Nos. 1070, 1281, and 1373

**CERTIFICATION OF COUNSEL REGARDING DEBTORS'
FIFTH OMNIBUS OBJECTION TO CERTAIN CLAIMS (SUBSTANTIVE)
(Reclassified Claims)**

The undersigned counsel to the Plan Administrator in the above-captioned cases hereby certifies as follows:

1. On June 4, 2025, the *Debtors' Fifth Omnibus Objection to Certain Claims (Substantive) (Reclassified Claims)* [Docket No. 1070] (the "Objection") was filed with the United States Bankruptcy Court for the District of Delaware (the "Court"). Attached thereto as Exhibit A was a proposed form of order granting the relief requested in the Objection (the "Proposed Order").

2. Pursuant to the notice of the Objection, the deadline to file a response to the Objection was June 25, 2025 at 4:00 p.m. (prevailing Eastern Time) (the "Response Deadline").

3. Prior to the Response Deadline, the Debtors received a formal response to the Objection and Proposed Order from Notions Marketing Corporation [Docket No. 1281] (the "Notion's Response").

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: JOANN Inc. (5540); Needle Holdings LLC (3814); Jo-Ann Stores, LLC (0629); Creative Tech Solutions LLC (6734); Creativebug, LLC (3208); WeaveUp, Inc. (5633); JAS Aviation, LLC (9570); joann.com, LLC (1594); JOANN Ditto Holdings Inc. (9652); Dittopatterns LLC (0452); JOANN Holdings 1, LLC (9030); JOANN Holdings 2, LLC (6408); and Jo-Ann Stores Support Center, Inc. (5027). The Debtors' mailing address is 5555 Darrow Road, Hudson, Ohio 44236.

4. On July 9, 2025, the Debtors filed a *Certification of Counsel Regarding Debtors' Fifth Omnibus Objection to Certain Claims (Substantive) (Reclassified Claims)* [Docket No. 1373] adjourning the Notion's Response to the omnibus hearing scheduled for August 14, 2025.

5. To resolve the Notions Response, the Plan Administrator and counsel to Notions Marketing Corporation agreed to a revised Proposed Order, a copy of which is attached hereto as **Exhibit A** (the “Revised Proposed Order”).

6. A redline comparing the Revised Proposed Order against the Proposed Order is attached hereto as **Exhibit B**.

7. The Plan Administrator respectfully requests that the Court enter the Revised Proposed Order at its earliest convenience.

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Dated: August 12, 2025
Wilmington, Delaware

/s/ Michael E. Fitzpatrick

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